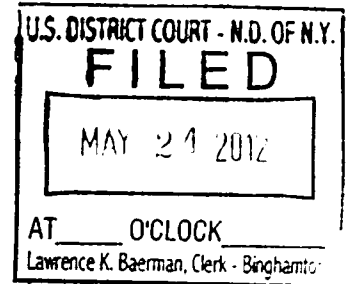


Cecilia Nicholas

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May 24, 2012



Hon. Thomas J. McAvoy
United States District Court
Northern District of New York
15 Henry St
Binghamton, New York 13901

RE: Nicholas v City of Binghamton et al Civil Index # 3:10-CV-1565
Request for extension of time to respond to Motion for Summary Judgment

Dear Judge McAvoy,

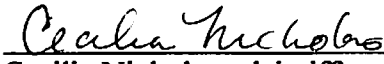
I am the pro se plaintiff in the above referenced matter. The defendants have filed a Motion for Summary Judgment. The deadline for plaintiff's response is set for May 25, 2012.

There are still some outstanding discovery issues that have been discussed at a Court conference with Magistrate Peeples on May 18, 2012. Plaintiff was directed to continue attempts to resolve these issues with defendants' attorneys prior to seeking permission to file a motion to compel. Communication is ongoing and there have been assurances that disclosures will be forthcoming.

As the disclosures in issue concern matters essential to the anticipated adequacy of plaintiff's responding submissions, I am seeking an extension of time to respond. At the May 18th conference, defendants' attorneys indicated they would not object to an extension.

I respectfully request that the Court grant an additional thirty days for plaintiff to submit an answer to the summary judgment motion.

Thank you for your consideration.


Cecilia Nicholas, plaintiff
607-722-8889
cecilianicholas1@gmail.com

cc: Brian Seachrist, Esq.
Patricia Cummings, Esq.